

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS, EL PASO DIVISION

FILED
01/21/2025
Clerk, U.S. District Court
Western District of Texas

By: **FMorales**
Deputy

USA
vs.
(1) JOSE EDMUNDO REYES-MORAN

§
§ CRIMINAL COMPLAINT
§ CASE NUMBER: EP:25-M -00239(1) - MAT
§
§

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **January 18, 2025** in **El Paso** county, in the **WESTERN DISTRICT OF TEXAS** defendant did, being an alien to the United States, enter, attempt to enter, or was found in the United States after having been previously excluded, deported, or removed from the United States without receiving permission to reapply for admission to the United States from the Attorney General of the United States and the Secretary of Homeland Security, the successor pursuant to Title 6, United States Code, Sections 202(3), 202(4), and 557

in violation of Title 8 United States Code, Section(s) 1326

I further state that I am a **Border Patrol Agent** and that this complaint is based on the following facts: *"The DEFENDANT, Jose Edmundo REYES-Moran, an alien to the United States and a citizen of Mexico was found at or near the 600 block of Zebu Road in El Paso, Texas in the Western District of Texas. From statements made by the DEFENDANT to*

Continued on the attached sheet and made a part of hereof.


Sworn to before me,

/s/ FLORES, ALBERT
Signature of Complainant
Border Patrol Agent

January 21, 2025
Date

at EL PASO, Texas
City and State

MIGUEL A. TORRES
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer
OATH TELEPHONICALLY SWORN
AT 2:00 P.M.
FED.R.CRIM.P. 4.1(b)(2)(A)

CONTINUATION OF CRIMINAL COMPLAINT - EP:25-M -00239(1)

WESTERN DISTRICT OF TEXAS

(1) JOSE EDMUNDO REYES-MORAN

FACTS (CONTINUED)

the arresting agent, the DEFENDANT was determined to be a native and citizen of Mexico, without immigration documents allowing him to be or remain in the United States legally. The DEFENDANT has been previously removed from the United States to Mexico on 11/01/2024 through Hidalgo, Tx. The DEFENDANT has not previously received the expressed consent from the Attorney General of the United States or the Secretary of Homeland Security to reapply for admission into the United States.

Because this affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

IMMIGRATION HISTORY:

The DEFENDANT has been removed 1 time, the last one being to MEXICO on November 1, 2024, through HIDALGO, TX

CRIMINAL HISTORY:

NONE